

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

STAR NEWS DIGITAL MEDIA, INC.,
MICHAEL PATRICK LEAHY,
and MATTHEW D. KITTLE,

Plaintiffs,

v.

Case No. 3:23-cv-00467
Judge Aleta A. Trauger

FEDERAL BUREAU OF INVESTIGATION,

Defendant.

DECLARATION OF MICHAEL PATRICK LEAHY

I, Michael Patrick Leahy, declare under the penalty of perjury that the following is true and correct:

1. I am a plaintiff in this action.
2. I am the CEO, Editor-in-Chief, and majority owner of Star News Digital Media, Inc., which owns and operates a family of state-focused conservative news sites including The Tennessee Star.
3. On the morning of November 6, 2023, I became aware that conservative talk show host Steven Crowder claimed to have come into possession of three pages of Audrey Hale's manifesto. The original story was published here: <https://www.louderwithcrowder.com/nashville-shooters-manifesto>.
4. Attached are the three images making up the leaked pages of the manifesto.

5. Shortly thereafter, on the morning of November 6, I published a story about the leak. In this story, we reported that “sources in the Tennessee General Assembly who were allowed to view the Covenant Killer Manifesto by the Metro Nashville Police Department have confirmed to *The Tennessee Star* that the documents released by Steven Crowder on Monday morning, which he purports to be part of Covenant killer Audrey Elizabeth Hale’s manifesto, are indeed part of the documents obtained by MNPd during their investigation, and were authentically written by Hale.” This story is available here: <https://tennesseestar.com/justice/sources-confirm-docs-leaked-by-crowder-are-authentic-covenant-killer-writings-mnpd-investigating/tpappert/2023/11/06/>.

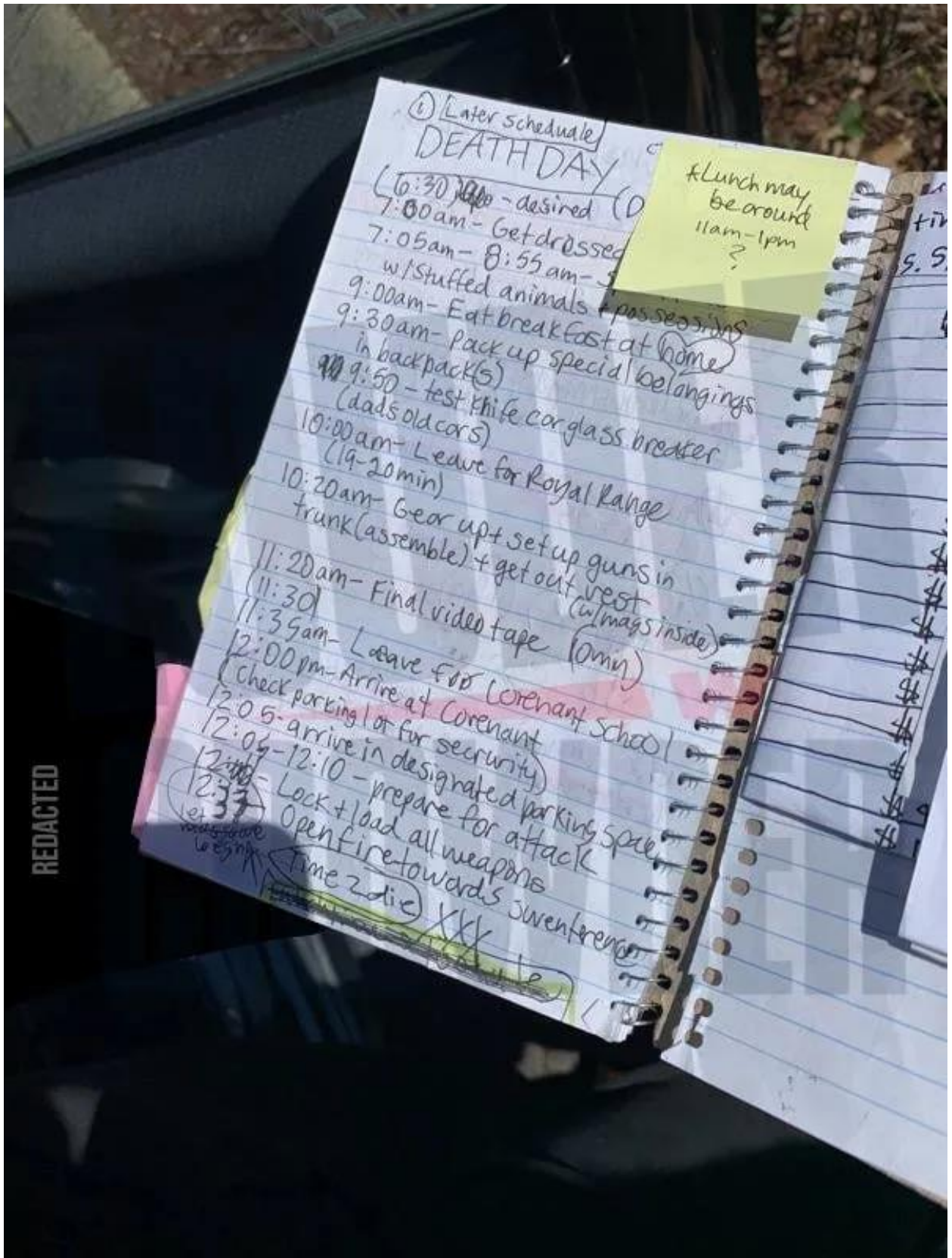
6. After I published my story, on the afternoon of November 6, the Metro Nashville Police Department released a statement refusing to confirm that the images were authentic. Instead, the department merely stated that the images “are not MNPd crime scene images.” The full MNPd statement is available here: <https://www.nashville.gov/departments/police/news/mnpd-statement-concerning-line-photograph-dissemination>.

7. The images of the leaked documents are a portion of the documents that I requested from FBI as part of my Freedom of Information Act request on April 20, 2023, which is the basis for this lawsuit.

Under the penalty of perjury, the foregoing statements are true and correct.

Dated: November 6, 2023

/s/ Michael Patrick Leahy
Michael Patrick Leahy



DEATH

DAY

To day is the day
The day has finally come!

3/27/23

I can't believe its here.
Don't know how I was able to get this far,
but here I am.

I'm a little nervous, but excited too.
Been excited for the past 2 weeks.

There were several times I could have been
caught, especially ~~back~~ in the summer of 2021.

None of that matters now. I'm almost an
hour & 7 minutes away.

Can't believe I'm doing this,
but I'm ready...

I hope my victims aren't.

My only fear is if anything goes wrong.
I'll do my best to prevent ~~any~~ of the sort.
(God let my wrath take over my anxiety)
It might be 10 minutes tops. It might be
3-7. It's gonna go quick.
I hope I have a high death count.

Ready to Die nana *Apalyn*

Aides

Kill those kids!!!

2/3/23

those crackers

going to private fancy schools
with those fancy kwakis + sports
backpacks

w/ thier ~~mom~~ daddies mustangs
+ convertables ~~thier~~

fuck you little shits

I wish to shoot you wealcass
dicks w/ your mop yellow hair

Wanna Kill all you cittle crackers!!!

Bunch of little faggots

w/ your white privlages

fuck you faggots

REDACTED